

# **DOCUMENT 7**

John Taladay (*pro hac vice*)  
john.taladay@bakerbotts.com  
Erik T. Koons (*pro hac vice*)  
erik.koons@bakerbotts.com  
BAKER BOTTS LLP  
1299 Pennsylvania Ave., NW  
Washington, D.C. 20004  
Telephone: (202)-639-7700  
Facsimile: (202)-639-7890

Stuart C. Plunkett (State Bar No. 187971)  
stuart.plunkett@bakerbotts.com  
BAKER BOTTS LLP  
101 California Street, Suite 3600  
San Francisco, California 94111  
Telephone: (415) 291-6200  
Facsimile: (415) 291-6300

*Attorneys for Defendants*  
*Irco GROUP CORP. and*  
*Irco DISPLAY DEVICES CO., LTD.*

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION,

) Case No. 3:07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:

*ALL DIRECT PURCHASER ACTIONS*

) **DECLARATION OF STUART C.**  
) **PLUNKETT IN SUPPORT OF IRICO**  
) **DEFENDANTS' SURREPLY TO MOTION**  
) **TO COMPEL JURISDICTIONAL**  
) **DISCOVERY**

) Special Master Hon. Vaughn R. Walker (Ret.)

1 I, Stuart C. Plunkett declare as follows:

2 1. I am an attorney admitted to practice law in this Court and in the State of  
3 California. I am a partner with the law firm of Baker Botts L.L.P., which represents Defendants  
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”)  
5 (collectively, “Irico Defendants”). I make this Declaration based on my personal knowledge and  
6 in support of the Irico Defendants’ surreply letter brief opposing the Direct Purchaser Plaintiffs’  
7 motion to compel jurisdictional discovery.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of the declaration of  
9 Zhaojie Wang in support of Irico Defendants’ motions to dismiss for lack of jurisdiction, filed  
10 with the Court on July 18, 2018.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of a July 25, 2018 email  
12 from Defendants, providing DPPs with the requested prior positions held by all employees  
13 identified as knowledgeable on U.S. sales.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
15 25th day of July 2018 in San Francisco, California.

17 /s/ Stuart C. Plunkett

18 Stuart C. Plunkett (State Bar No. 187971)  
19 stuart.plunkett@bakerbotts.com  
20 BAKER BOTTS LLP  
21 101 California Street, Suite 3600  
22 San Francisco, California 94111  
23 Telephone: (415) 291-6200  
24 Facsimile: (415) 291-6300

25 *Attorneys for Defendants*  
26 *Irico GROUP CORP. and*  
27 *Irico DISPLAY DEVICES CO., LTD.*  
28

# Exhibit 1

**UNITED STATES DISTRICT COURT**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION,

Case No. 3:07-cv-05944-JST

MDL No.: 1917

THIS DOCUMENT RELATES TO:

## ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF ZHAOJIE  
WANG IN SUPPORT OF IRICO  
DEFENDANTS' MOTIONS TO  
DISMISS FOR LACK OF  
JURISDICTION**

1 I, Zhaojie Wang, declare as follows:

2 本人，王昭杰，特此声明如下：

3 1. I make this declaration in support of Irico Group Corporation (“Irico Group”) and  
4 Irico Display Devices Co., Ltd.’s (“Irico Display”) motions to dismiss. I have personal  
5 knowledge of the facts set forth herein. If called as a witness, I could and would competently  
6 testify to the facts below.  
7

8 我做此声明是为了支持彩虹集团公司（以下简称“彩虹集团”）和彩虹显示  
9 器件股份有限公司（以下简称“彩虹股份”）的关于管辖权问题的动议。我对本声明所列  
10 的事实具有个人认知。如果被要求作证，我能够并且将会胜任地对下述事实作出证明。  
11

12 2. I am the General Manager of Irico Smart Lighting Company, which is a  
13 controlled subsidiary of Irico Group. Irico Group holds 80% of the shares of Irico Smart Lighting  
14 Company, and another controlled subsidiary of Irico Group, Hefei Rainbow Blue-Ray  
15 Technology Company, holds the remaining 20% of this company.  
16

17 我是中电彩虹智慧照明科技有限公司的总经理，该公司是彩虹集团的控股  
18 子公司。彩虹集团持有该公司 80%的股份，彩虹集团控股的另一个子公司，合肥彩虹蓝光  
19 科技公司，持有该公司剩余的 20%的股份。  
20

21 3. I have been employed by Irico Group or its subsidiary companies for more than  
22 25 years. I first joined Irico Group in July of 1991 as an employee of Plant No. 1, which was then  
23 producing 14” Color Picture Tubes (CPTs) for use in the production of televisions.

24 我在彩虹集团或其子公司的工作超过了 25 年。我最初于 1991 年 7 月加入彩  
25 虹集团并成为彩管一厂的一名员工。彩管一厂当时生产电视机中使用的 14 寸彩色显像管。  
26

27 4. In March 1993, I became a sales person in the Sales Department of Irico Group,  
28 with responsibility for selling both CPTs and Color Display Tubes (CDTs). I became a Director

1 in the Sales Department of Irico Group in March 2003 and remained in that position until May  
2 2010. Thus, at the time that the complaint in this case was filed in November 2007, I was a  
3 Director in the Sales Department of Irico Group. After 2009, I became the Assistant to the  
4 General Manager of the Sales Department of Irico Group.

5 在 1993 年 3 月, 我成为了彩虹集团销售公司的一名业务员, 主要负责销售  
6 CPTs 和 CDTs。在 2003 年 3 月, 我成为了彩虹集团销售部的部长, 并且在此职位上一  
7 到 2010 年 5 月。因此, 在 2007 年 11 月本案最初诉状提交时, 我是彩虹集团销售部的部  
8 长。大约在 2009 年后, 担任销售公司总经理助理。

10 5. From at least July 1991 through January 2005, Irico Group was responsible for all  
11 sales of CPTs and CDTs sold by Irico Group and its subsidiaries. Irico Display did not have a  
12 separate sales group and did not execute any sales of CRTs. All sales of products manufactured  
13 by Irico Display were carried out by Irico Group.

15 至少从 1991 年 7 月到 2005 年 1 月期间, 彩虹集团负责其本身和其所有子公  
16 司的 CPTs 和 CDTs 的销售。彩虹股份没有自己独立的销售团队, 所以也不从事 CRTs 的  
17 实际销售。彩虹股份生产的所有产品都由彩虹集团代为销售。

19 6. Following my tenure in the Sales Department of Irico Group, in May 2010 I was  
20 transferred to Irico Group Electronics Co. Ltd. ("Irico Electronics") to become the Deputy  
21 General Manager of Sales, where my focus was on the sale of solar panels and related products.  
22 In November 2007, Irico Electronics held all of the shares of Irico Display owned indirectly by  
23 Irico Group, which comprised 41.36% of the outstanding shares of Irico Display.

25 在彩虹集团销售公司任职期间, 我在 2010 年 5 月调动到彩虹集团电子股份  
26 有限公司 (以下简称“彩虹电子”) 并成为了营销部副总经理。我的工作重心是负责太阳  
27  
28

1 能电池板和相关产品的销售。在 2007 年 11 月，彩虹电子持有彩虹股份 41.36%的股份，  
2 并间接被彩虹集团持有。

3 7. I became the General Manager of Sales for Irigo Electronics in January 2011 and  
4 remained in that role until July 2013 when I was transferred to Irigo Smart Lighting to assume my  
5 current position.

6 我在 2011 年 1 月成为彩虹电子营销部的经理，并且在此职位上一直到 2013  
7 年 7 月，后来被调动到中电彩虹智慧照明科技有限公司担任目前的职务。

8 9. My appointments to Irigo Electronics and Irigo Smart Lighting were directed by  
10 the SASAC-appointed management of Irigo Group. Irigo Group management issued instructions,  
11 through the Irigo Group Human Resources Department, to Irigo Electronics and Irigo Smart  
12 Lighting to furnish my employment in the positions that Irigo Group directed.

13 我在彩虹电子和中电彩虹智慧照明科技有限公司的任职是受由国资委任命  
14 的彩虹集团的管理层所指示的。彩虹集团管理层通过其人力资源部向彩虹电子和中电彩  
15 虹智慧照明科技有限公司发出指示，来完成我在这两个公司的职位的任命。

16 17. Based on my experience throughout my time at Irigo Group and Irigo Electronics,  
18 this practice was common to all Irigo Group companies, including Irigo Display. The  
19 management of Irigo Display was appointed directly by the SASAC-appointed management of  
20 Irigo Group. The management positions of Irigo Display that were appointed by Irigo Group  
21 included the Chinese equivalent of all “Chief” positions (e.g., Chief Executive Officer, Chief  
22 Financial Officer, etc.) as well as all Directors and Associate Directors of Departments (e.g.,  
23 Human Resources Department, Finance Department and Operation Department).

24 根据我在彩虹集团和彩虹电子的工作经历，这样的操作在彩虹的公司中，  
25 包括彩虹股份，是非常常见的。彩虹股份的管理层是由国资委任命的彩虹集团的管理层  
26 27 28



1 来直接任命的。由彩虹集团任命的彩虹股份的管理层职位包括中文中所指的所有高层  
2 （例如，总经理，财务总监等），以及公司所有部门的部长和副部长。

3 10. Although by November 2007 the majority of the shares of Irico Display were  
4 traded publicly, Irico Group controlled Irico Display and did not seek or require any separate  
5 authorization from shareholders or the Board of Directors of Irico Display to exercise control and  
6 appoint the management of Irico Display.  
7

8 尽管在 2007 年 11 月，彩虹股份的多数股份是在市场上流通的，但是彩虹  
9 集团控制着彩虹股份，而且没有也不需要寻求彩虹股份其他股东或董事会的批准来控制  
10 和任命彩虹股份的管理层。  
11

12 11. Moreover, Irico Display was required to submit regular financial, operational, and  
13 investment reports to Irico Group for approval. Also, all of Irico Display's financial results were  
14 consolidated into Irico Group's financial statements and formed part of the basis for Group's  
15 mandatory after-tax payments to SASAC and to the Chinese Ministry of Finance.  
16

17 而且，彩虹股份必须定期提交财务、经营和投资报告给彩虹集团批准。彩  
18 虹股份所有的经营业绩都要合并到彩虹集团的财务报表中，并成为彩虹集团向国资委和  
19 财政部上缴税后收入的一部分。

20 12. Based on my work at the Sales Department of Irico Group, I am not aware of any  
21 sales of any Irico products to the United States. With regard to CRTs (including both CPTs and  
22 CDTs) made by Irico Group companies, neither Irico Group nor Irico Display, nor any other  
23 subsidiary of Irico Group sold any CRTs to the United States at any time from 1995-2007. Also,  
24 neither Irico Group nor Irico Display, nor any other subsidiary of Irico Group, sold any finished  
25 products (i.e., TVs or computer monitors) containing CRTs made by Irico Group companies to  
26 the United States at any time from 1995-2007.  
27  
28

1 根据我在销售公司的工作经历，我从未发现有彩虹的产品销往美国。从  
2 1995 年到 2007 年期间，针对彩虹所有公司生产的 CRTs（包括 CPTs 和 CDTs），彩虹集  
3 团，彩虹股份和彩虹集团的任何子公司均没有将其销往美国。另外，从 1995 年到 2007  
4 年期间，彩虹集团，彩虹股份和彩虹集团的任何子公司均没有将含有彩虹的任何公司生  
5 产的 CRTs 的最后成品（例如，电视机或电脑显示器）销往美国。  
6

7 13. Employees of the Sales Department of Irico Group had geographic responsibility  
8 as well as product responsibility. Irico Group sold the vast majority of its CRTs within China,  
9 with only limited sales outside of China. No sales personnel of the Irico Group Sales Department  
10 were assigned to sell CRT products to the United States and no sales employees were authorized  
11 to do so.  
12

13 彩虹集团销售公司的员工既有地域的职责也有产品的职责。彩虹集团绝大  
14 多数的销售都在中国，只有少量的出口。彩虹集团销售公司的销售人员没有被派遣销售  
15 CRT 产品到美国，也没有员工被授权这样做。  
16

17 14. Moreover, neither Irico Group nor Irico Display, nor any other subsidiary of Irico  
18 Group, ever manufactured televisions. Irico Group companies manufactured only the CPTs used  
19 to produce televisions and a small number of CDTs, not the finished products themselves.  
20

21 而且，彩虹集团，彩虹股份和彩虹集团的任何子公司都没有生产过电视机。  
22 彩虹集团的所有公司生产的只有用于生产电视机的 CPTs，及少量的 CDTs。  
23

24 15. Likewise, neither Irico Group nor Irico Display, nor any other subsidiary of Irico  
25 Group, ever manufactured computer monitors. These companies manufactured only a small  
26 number of CDTs used to make computer monitors, not the finished products themselves.  
27

28 同样的，彩虹集团，彩虹股份和彩虹集团的任何子公司都没有生产过电脑  
显示器。这些公司只生产过少量用于制造电脑显示器的 CDTs，而非最终成品。

1           16. To be clear on the latter point, Irico Group was a party to one joint venture (JV)  
2 that made computer monitors. In approximately 1996, Irico Group entered into a JV with a  
3 Taiwanese company named HuangQi. The JV established a facility in China to assemble  
4 computer monitors. The name of the JV was the Irico HuangQi Company. The JV assembled  
5 monitors utilizing both Irico CDTs and CDTs purchased from other CDT manufacturers. The JV,  
6 however, was very unsuccessful and was dissolved at a total loss to Irico in around 2001.

7           上一个陈述的更清楚的阐述是，彩虹集团曾经是一个制造电脑显示器的合  
8 资公司的股东。在大约在 1996 年，彩虹集团与台湾一家叫皇旗的公司成立了一个合资公  
9 司。该合资公司在中国建立了工厂用来组装电脑显示器。该合资公司的名字是彩虹皇旗  
10 公司。该合资公司组装电脑显示器时使用了彩虹制造的 CDTs 和其他 CDTs 制造商的产品。  
11 但是，这个合资公司经营不善，并于 2001 左右因给彩虹造成财产损失而解散。

12           17. The JV manufactured only 14", 15" and 17" CDT Monitors. These were sold by  
13 the JV in China or Taiwan. The sales of JV's products in China was handled by the JV itself, and  
14 the sales made to other regions or countries (including Taiwan) was handled by a Hong Kong  
15 subsidiary of HuangQi, the Taiwanese partner of the JV.

16           该合资公司只生产含有 14 寸、15 寸和 17 寸 CDT 的显示器。这些产品被销  
17 往中国或台湾。国内销售由该公司销售团队完成，海外销售（包括在台湾的销售）由皇  
18 旗设在香港的子公司负责。

19           I declare under penalty of perjury under the laws of the United States of America that the  
20 foregoing is true and correct.

21           本人证明，以上内容是真实和正确的，如有不实依照美国法律甘受伪证罪处罚。

22           Executed this 18th day of July, 2018, in Xianyang City, Shaanxi Province, People's  
23 Republic of China.

于 2018 年 7 月 18 日在中华人民共和国陕西省咸阳市签署。



Mr. Zhaojie Wang

王昭杰

# Exhibit 2

**Carter, Tom**

---

**From:** Carter, Tom  
**Sent:** Wednesday, July 25, 2018 3:17 PM  
**To:** 'Matthew Heaphy'  
**Cc:** Koons, Erik; Eickhof, Ashley; Plunkett, Stuart; Yang, Kaylee; Taladay, John; 'Rick Saveri'; 'Geoff Rushing'; 'Cadio Zirpoli'; 'malioto@tatp.com'; 'lauren russell@tatp.com'; 'jpatane@tatp.com'; 'CMicheletti@zelle.com'; Stoler, Reilly  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST  
**Attachments:** 2018-07-25 Irico Supplemental Response to DPP Info Request re Employees.pdf

Counsel:

Please see attached for a list of prior positions held by the employees listed in Irico's interrogatory responses.

Best,  
Tom Carter

---

**From:** Carter, Tom  
**Sent:** Friday, June 29, 2018 9:02 AM  
**To:** Matthew Heaphy <mheaphy@saveri.com>  
**Cc:** Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Rick Saveri <Rick@saveri.com>; Geoff Rushing <Geoff@saveri.com>; Cadio Zirpoli <cadio@saveri.com>; malioto@tatp.com; lauren russell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; Stoler, Reilly <reilly.stoler@bakerbotts.com>  
**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Dear Matt & Geoff:

Please see the attached supplemental response by Irico to your information request regarding potential deponents. Irico disputes the contention in your June 21, 2018 letter that we agreed to provide all the information described in your letter regarding the individuals listed in our Interrogatory responses, and such information is not required under the Court's Order Re Discovery and Case Management Protocol (Dkt. 1128). However, Irico is providing information below on these employees' current or most recent title, and will search for and provide information on prior positions held by each employee that are relevant to their knowledge of information covered by Irico's Interrogatory responses.

1. Guo Mengquan (former employee, retired May 2017): former Deputy General Manager, Irico Group
2. Hou Ruijin (current employee): Asset Manager, Irico Group
3. Long Tao (current employee): Secretary of the office of Board of Directors, Irico Display
4. Yan Yunlong (current employee): General Counsel, Irico Group
5. Zhang Shaowen (former employee, retired Mar. 2016) - former Deputy General Manager, Irico Group
6. Zhu Xiaohang (current employee): Secretary of the office of Board of Directors, Irico Electronics

Best,  
Tom Carter

---

**From:** Matthew Heaphy <mheaphy@saveri.com>  
**Sent:** Thursday, June 21, 2018 6:35 PM

**To:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Cc:** Koons, Erik <[erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)>; Eickhof, Ashley <[Ashley.Eickhof@BakerBotts.com](mailto:Ashley.Eickhof@BakerBotts.com)>; Plunkett, Stuart <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)>; Yang, Kaylee <[kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Rick Saveri <[Rick@saveri.com](mailto:Rick@saveri.com)>; Geoff Rushing <[Geoff@saveri.com](mailto:Geoff@saveri.com)>; Cadio Zirpoli <[cadio@saveri.com](mailto:cadio@saveri.com)>; [malioto@tatp.com](mailto:malioto@tatp.com); [lauren russell@tatp.com](mailto:lauren russell@tatp.com); [jpatane@tatp.com](mailto:jpatane@tatp.com); [CMicheletti@zelle.com](mailto:CMicheletti@zelle.com); Stoler, Reilly <[reilly.stoler@bakerbotts.com](mailto:reilly.stoler@bakerbotts.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Tom:

Please see the attached correspondence from Geoff Rushing.

Best,  
Matt

Matthew Heaphy  
Saveri & Saveri, Inc.  
706 Sansome Street  
San Francisco, CA 94111  
[mheaphy@saveri.com](mailto:mheaphy@saveri.com)  
Telephone: (415) 217-6810  
Facsimile: (415) 217-6813

---

**From:** [Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com) [<mailto:Tom.Carter@BakerBotts.com>]

**Sent:** Tuesday, June 19, 2018 5:30 PM

**To:** Matthew Heaphy

**Cc:** [erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com); [Ashley.Eickhof@BakerBotts.com](mailto:Ashley.Eickhof@BakerBotts.com); [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com); [kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com); [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com); Rick Saveri; Geoff Rushing; Cadio Zirpoli; [malioto@tatp.com](mailto:malioto@tatp.com); [lauren russell@tatp.com](mailto:lauren russell@tatp.com); [jpatane@tatp.com](mailto:jpatane@tatp.com); [CMicheletti@zelle.com](mailto:CMicheletti@zelle.com); [reilly.stoler@bakerbotts.com](mailto:reilly.stoler@bakerbotts.com)

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Matt:

Please see the attached for additional information Irico has gathered in response to your request regarding potential Irico deponents.

Best,  
Tom Carter

---

**From:** Carter, Tom

**Sent:** Friday, June 8, 2018 12:39 PM

**To:** 'Matthew Heaphy' <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Cc:** Koons, Erik <[erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)>; Eickhof, Ashley <[Ashley.Eickhof@BakerBotts.com](mailto:Ashley.Eickhof@BakerBotts.com)>; Plunkett, Stuart <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)>; Yang, Kaylee <[kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; 'Rick Saveri' <[Rick@saveri.com](mailto:Rick@saveri.com)>; 'Geoff Rushing' <[Geoff@saveri.com](mailto:Geoff@saveri.com)>; 'Cadio Zirpoli' <[cadio@saveri.com](mailto:cadio@saveri.com)>; 'malioto@tatp.com' <[malioto@tatp.com](mailto:malioto@tatp.com)>; 'lauren russell@tatp.com' <[lauren russell@tatp.com](mailto:lauren russell@tatp.com)>; 'jpatane@tatp.com' <[jpatane@tatp.com](mailto:jpatane@tatp.com)>; 'CMicheletti@zelle.com' <[CMicheletti@zelle.com](mailto:CMicheletti@zelle.com)>; Stoler, Reilly <[reilly.stoler@bakerbotts.com](mailto:reilly.stoler@bakerbotts.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Matt:

Irico is working on gathering last known addresses for all the former employees on your list that are not currently represented by us, and we expect to have those for you by next week at the latest. With regard to the individuals identified as having knowledge in Irico's interrogatory responses, all of them are represented by us and may be contacted through counsel. With the exception of Mr. Guo Mengquan and Mr. Zhang Shaowen, all of these individuals are current employees of Irico. We will also provide you with their current titles by next week.

Best regards,  
Tom Carter

---

**From:** Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Sent:** Thursday, June 7, 2018 3:18 PM

**To:** Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>

**Cc:** Koons, Erik <[erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)>; Eickhof, Ashley <[Ashley.Eickhof@BakerBotts.com](mailto:Ashley.Eickhof@BakerBotts.com)>; Plunkett, Stuart <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)>; Yang, Kaylee <[kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com)>; Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>; Rick Saveri <[Rick@saveri.com](mailto:Rick@saveri.com)>; Geoff Rushing <[Geoff@saveri.com](mailto:Geoff@saveri.com)>; Cadio Zirpoli <[cadio@saveri.com](mailto:cadio@saveri.com)>; [malioto@tatp.com](mailto:malioto@tatp.com); [lauren russell@tatp.com](mailto:lauren russell@tatp.com); [jpatane@tatp.com](mailto:jpatane@tatp.com); [CMicheletti@zelle.com](mailto:CMicheletti@zelle.com)

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Tom:

Please see the attached correspondence from Geoff Rushing.

Best,  
Matt

Matthew Heaphy  
Saveri & Saveri, Inc.  
706 Sansome Street  
San Francisco, CA 94111  
[mheaphy@saveri.com](mailto:mheaphy@saveri.com)  
Telephone: (415) 217-6810  
Facsimile: (415) 217-6813

---

**From:** [Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com) [<mailto:Tom.Carter@BakerBotts.com>]

**Sent:** Tuesday, June 05, 2018 10:05 PM

**To:** Rick Saveri; Cadio Zirpoli; [malioto@tatp.com](mailto:malioto@tatp.com); [lauren russell@tatp.com](mailto:lauren russell@tatp.com); [jpatane@tatp.com](mailto:jpatane@tatp.com); [CMicheletti@zelle.com](mailto:CMicheletti@zelle.com); Geoff Rushing; Matthew Heaphy

**Cc:** [erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com); [Ashley.Eickhof@BakerBotts.com](mailto:Ashley.Eickhof@BakerBotts.com); [stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com); [kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com); [john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Dear Counsel:

Please see attached for Irico's responses to the request in your April 9, 2018 letter regarding potential Irico deponents. Irico has identified the employment status (and departure date, if relevant) of 35 out of the 36 individuals named in your list. Irico has been unable to locate information regarding Liu Linghai; if you could share more detail on how Liu Linghai was chosen for your list, that may help with providing the information you requested. All current Irico employees and individuals identified in Irico's interrogatory responses will be represented by us and can be reached through counsel.

Given the large number of former Irico employees on the list, including many that left the company more than 5 years ago, we request that plaintiffs consider the information provided thus far and narrow the list so that Irico can better



prioritize the burdensome task of reaching out to each of these former employees to determine if they would accept representation by counsel for Irico.

Thank you,

**Tom Carter**

Associate

**Baker Botts L.L.P.**

[tom.carter@bakerbotts.com](mailto:tom.carter@bakerbotts.com)

T +1.202.639.7702

F +1.202.585.4085

M +1.202.412.4352

The Warner  
1299 Pennsylvania Ave NW  
Washington, DC 20004  
USA



*Admitted to practice in New York and the District of Columbia.*

---

**From:** Rick Saveri <[Rick@saveri.com](mailto:Rick@saveri.com)>

**Sent:** Monday, April 9, 2018 1:31 PM

**To:** Taladay, John <[john.taladay@bakerbotts.com](mailto:john.taladay@bakerbotts.com)>

**Cc:** Koons, Erik <[erik.koons@bakerbotts.com](mailto:erik.koons@bakerbotts.com)>; Carter, Tom <[Tom.Carter@BakerBotts.com](mailto:Tom.Carter@BakerBotts.com)>; Eickhof, Ashley <[Ashley.Eickhof@BakerBotts.com](mailto:Ashley.Eickhof@BakerBotts.com)>; Plunkett, Stuart <[stuart.plunkett@bakerbotts.com](mailto:stuart.plunkett@bakerbotts.com)>; Yang, Kaylee <[kaylee.yang@bakerbotts.com](mailto:kaylee.yang@bakerbotts.com)>; Geoff Rushing <[Geoff@saveri.com](mailto:Geoff@saveri.com)>; Matthew Heaphy <[mheaphy@saveri.com](mailto:mheaphy@saveri.com)>

**Subject:** RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

John: Please see attached letter.

Rick

R. Alexander Saveri  
Saveri & Saveri, Inc.  
706 Sansome Street  
San Francisco, CA 94111  
Tel: (415) 217-6810  
Fax: (415) 217-6813

**CONFIDENTIALITY NOTICE**

This electronic mail transmission and any attachments contain privileged and confidential information. The information is intended solely for use by the individual or entity named as the recipient hereof. If you are not the intended recipient,

please note that any disclosure, copying, distribution, or use of the contents of this transmission is prohibited. If you have received this transmission in error, please immediately delete it and notify us by telephone.

**Confidentiality Notice:**

The information contained in this email and any attachments is intended only for the recipient[s] listed above and may be privileged and confidential. Any dissemination, copying, or use of or reliance upon such information by or to anyone other than the recipient[s] listed above is prohibited. If you have received this message in error, please notify the sender immediately at the email address above and destroy any and all copies of this message.

**Irico Supplemental Response to DPP Information Request Regarding Irico  
Employees with Knowledge of Interrogatory Topics**

Hou Ruijin (current employee)

- Jan. 1981-Aug. 1988: Technician & Team Leader, CRT No. 1 Plant
- Aug. 1988-Jan. 1995: Workshop Deputy Director & Director, CRT No. 2 Plant
- Jan. 1995-June 1996: Deputy General Manager, Irico Display
- June 1996-Mar. 1999: General Manager, Irico Display
- Mar. 1999-May 2001: Deputy Director (Quality Assurance), Irico CRT Central Plant
- May 2001-present: Manager, Irico Group (Technical Quality, Enterprise Management, Capital Operation, Asset Finance, and Asset Management Departments)
- Current: Asset Manager, Irico Group

Long Tao (current employee)

- May 1992-Oct. 1996: Accountant in the Finance Department, Irico Group
- Oct. 1996-Nov. 2000: Chief of Finance, Irico CRT No. 1 Plant
- Nov. 2000-June 2007: Chief of Finance, Irico Group Glass Factory
- July 2009-Nov. 2009: Deputy Director (Finance), Irico Display
- Nov. 2009-Oct. 2010: Director (Capital Operation), Irico Display
- Apr. 2010-present: Secretary to the Board of Directors, Irico Display
- Aug. 2013-Apr. 2014 (concurrent): Director (Finance), Irico Display

Yan Yunlong (current employee)

- Feb. 1992-June 1995: employee, Irico CRT No. 1 Plant
- June 1995-2001: Director (Technology Center), Irico Group
- 2001-June 2016: Operation Manager, Office of Irico Group; Assistant to the Director, Enterprise Management Department of Irico Group; Deputy Director, Administrative and Legal Department of Irico Group.
- July 2016-present: General Counsel, Irico Group

Zhang Shaowen (former employee, retired Mar. 2016)

- Jan. 1981-Apr. 1988: Technician & Team leader, CRT No. 1 Plant
- Apr. 1988-May 1991: Technician & Team leader, CRT No. 2 Plant
- May 1991-Feb. 1995: Workshop Director & Section Chief, Irico CPT No. 1 Plant
- Feb. 1995-Feb. 1998: Deputy General Manager & General Manager, Irico Group Screen Factory
- Feb. 1998-Mar. 2001: General Manager, Irico CRT No. 1 Plant
- Mar. 2001-Mar. 2016: Deputy General Manager, Irico Group
- Mar. 2016: retired

Zhu Xiaohang (current employee)

- July 1991-Oct. 2009: Project Management Engineer (Department of Strategic Planning), Irico Group; Director of the Office of the Board of Directors, Irico Electronics
- Nov. 2009-Nov. 2012: Joint company Secretary of the Board of Directors, Irico Electronics
- Nov. 2012-present: Secretary of the Board of Directors, Irico Electronics/Irico Group New Energy Co. Ltd.<sup>1</sup>

Guo Mengquan (former employee, retired May 2017)

- Sept. 1983-Jan. 1987: Technical employee, Shaanxi Color CRT Central Plant
- Jan. 1987-Sept. 1988: Associate Director (CPT Department), Shaanxi Color CRT Central Plant
- Sept. 1988-Jan. 1990: Director (CPT Department), Shaanxi Color CRT Central Plant
- Jan. 1990-Sept. 1996: Associate General Manager (Glass Plant), Shaanxi Color CRT Central Plant
- Sept. 1996-Apr. 2001: General Manager (Glass Plant), Shaanxi Color CRT Central Plant
- Apr. 2001-Apr. 2013: Deputy General Manager, Irico Group
- Aug. 2005-Nov. 2007 (concurrent): General Manager, Irico Electronics
- Nov. 2007-Aug. 2011 (concurrent): Deputy Chairman of the Board, Irico Display
- Apr. 2013-Apr. 2016: General Manager, Irico Group
- June 2013-2015 (concurrent): Chairman of the Board, Irico Electronics
- June 2013-May 2016 (concurrent): Chairman of the Board, Irico Display
- Apr. 2016-May 2017: Deputy Chairman of the Board, Irico Group

---

<sup>1</sup> In 2015, Irico Electronics formally changed its name from “Irico Group Electronics Co. Ltd.” to “Irico Group New Energy Co. Ltd.”